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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

MARISSA E. HARRIS,

Plaintiff,

v.

FIRST NATIONAL COLLECTION  
BUREAU, INC.,

Defendant.

Case No. 3:21-cv-00465-MMD-CSD

**PROPOSED STIPULATED DISCOVERY  
PLAN AND SCHEDULING ORDER**

**PLAINTIFF'S ONLY REPORT**

Plaintiff Marissa E. Harris ("Plaintiff") by and through undersigned counsel of record, submits her Stipulated Discovery Plan and Scheduling Order pursuant to Fed. R. Civ. P. 26(f) and LR 26-1.<sup>1</sup>

(1) **Discovery Cut-Off Date:** Defendant first appeared after responding to Plaintiff's complaint on April 19, 2022. Discovery Cut-Off shall be 180 days from Defendant's answer on October 17, 2022.

(2) **Amending the Pleadings and Adding Parties:** July 19, 2022

(3) **Fed. R. Civ. P. 26(a)(2) Disclosures (Experts):**

Expert disclosures: August 18, 2022  
Rebuttal-expert disclosures: September 19, 2022

(4) **Dispositive Motions:** November 16, 2022

<sup>1</sup> Plaintiff's counsel has sent multiple emails and phone calls to Defendant's counsel of record regarding this case and this instant order. Defendant has failed to respond.

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2 (5) **Pretrial Order:** December 16, 2022

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4 (6) **Fed. R. Civ. P. 26(a)(3) Disclosures.** December 30, 2022

5 (7) **Alternative Dispute Resolution.**

6 The parties certify that they met and conferred about the possibility of using alternative  
7 dispute-resolution processes including mediation, arbitration, and if applicable, early  
8 neutral evaluation. The parties believe that this case is best suited for meditation.

9 (8) **Alternative Forms of Case Disposition:** The parties certify that have considered consent  
10 to trial by a magistrate judge and have chosen to not to consent.

11 (9) **Electronic Evidence.** The parties certify that have discussed ESI and have agreed to  
12 produce all ESI in .pdf format.

13 By: /s/ Nicholas M. Wajda

14 Nev. Bar No. 11480

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21 *Attorney for the Plaintiff*  
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**ORDER**

IT IS SO ORDERED:

DATED: \_\_\_\_\_

\_\_\_\_\_  
THE HONORABLE JUDGE GLORIA M. NAVARRO